

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

MICHAEL W. TOLOMEO and  
SERAFIN CHAVEZ, individually, and as  
representatives of a Class of Participants  
and Beneficiaries of the RR Donnelley  
Savings Plan,

Plaintiffs,

v.

R.R. DONNELLEY & SONS, INC., et al.,

Defendants.

Case No. 1:20-cv-7158

Hon. Mary M. Rowland

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**PLAINTIFFS' MOTION FOR FINAL APPROVAL  
OF CLASS ACTION SETTLEMENT**

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**TO ALL PARTIES AND THEIR COUNSEL OF RECORD:**

PLEASE TAKE NOTICE that on Thursday, May 23, 2024, at 10 a.m., in Courtroom 1225 of the Everett M. Dirksen U.S. Courthouse, 219 S. Dearborn St., Chicago, IL 60604, Plaintiffs Michael W. Tolomeo and Serafin Chavez ("Plaintiffs") will and hereby do move this Court for an Order granting final approval of the parties' Class Action Settlement Agreement (Dkt. 96-1).

This motion is made pursuant to Federal Rule of Civil Procedure 23(e) and Section 2.5 of the Parties' Class Action Settlement Agreement and is based on the accompanying Memorandum of Law and authorities cited therein, the Declarations of Paul M. Secunda and Jeffrey Mitchell and exhibits attached thereto, the previously filed declarations of the Class Representatives (Dkts. 97, 98), the Settlement Agreement, and all files, records, and proceedings in this matter. A proposed Final Approval Order is being submitted in connection with this motion as **Exhibit 1**.

Defendants do not oppose the motion as parties to the Settlement.

Dated this 9<sup>th</sup> day of May, 2024

Respectfully submitted,

**WALCHESKE & LUZI, LLC**

/s/ Paul M. Secunda

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ATTORNEYS FOR PLAINTIFFS and  
SETTLEMENT CLASS

**CERTIFICATE OF SERVICE**

I hereby certify that on May 9, 2024, I caused a copy of the foregoing to be electronically filed with the Clerk of the Court by using the CM/ECF system, which will send a notice of electronic filing to all counsel of record.

**s/Paul M. Secunda**  
Paul M. Secunda